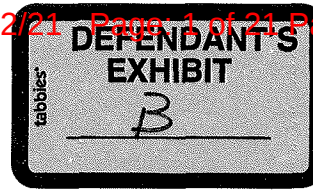




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20SL-CC05560 - ALICE M KOPP V WALGREEN CO. (E-CASE)

Case Headers	Parties & Attorneys	Docket Entries	Charges, Judgments & Sentences	Service Information	Filings Due	Scheduled Hearings & Trials	Civil Judgments	Garnishments/Execution
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[Click here to eFile on Case](#)Sort Date Entries: ☒ Descending

Display Options:

[Click here to Respond to Selected Documents](#)☐ Ascending01/27/2021 ☐ [Cert Serv of Rspns to Interrog](#)

Certificate of Mailing; Electronic Filing Certificate of Service.

Filed By: JUSTIN SETH CHAPPELL

On Behalf Of: WALGREEN CO., WALGREENS #05667

01/14/2021 ☐ [Cert Serv Answers Interrog Fil](#)

Certificate of Service; Electronic Filing Certificate of Service.

Filed By: ROBERT JOSEPH RADICE

On Behalf Of: ALICE M. KOPP

12/30/2020 ☐ [Cert Serv of Interrog Filed](#)

Certificate of Service; Electronic Filing Certificate of Service.

Filed By: JUSTIN SETH CHAPPELL

On Behalf Of: WALGREEN CO.

12/28/2020 ☐ [Cert Serv of Interrog Filed](#)

Certificate of Service; Electronic Filing Certificate of Service.

Filed By: ROBERT JOSEPH RADICE

On Behalf Of: ALICE M. KOPP

12/17/2020 ☐ [Answer Filed](#)

Filed By: JUSTIN SETH CHAPPELL

On Behalf Of: WALGREEN CO., WALGREENS #05667

☐ [Entry of Appearance Filed](#)

Entry of Appearance; Electronic Filing Certificate of Service.

Filed By: JUSTIN SETH CHAPPELL

12/07/2020 ☐ [Corporation Served](#)

Document ID - 20-SMCC-10249; Served To - WALGREEN CO.; Server - ; Served Date - 20-NOV-20; Served Time - 00:00:00; Service Type - Sheriff Department; Reason Description - Served

11/12/2020 ☐ [Summons Issued-Circuit](#)

Document ID: 20-SMCC-10249, for WALGREEN CO..Summons Attached in PDF Form for Attorney to Retrieve from Secure Case.Net and Process for Service.

11/05/2020 ☐ [Filing Info Sheet eFiling](#)

Filed By: ROBERT JOSEPH RADICE

☐ [Note to Clerk eFiling](#)

Filed By: ROBERT JOSEPH RADICE

☐ [Pet Filed in Circuit Ct](#)

Petition.

On Behalf Of: ALICE M. KOPP

☐ [Judge Assigned](#)

DIV 18

IN THE CIRCUIT COURT OF THE COUNTY OF ST. LOUIS
STATE OF MISSOURI

ALICE M. KOPP,)	
)	
Plaintiff,)	Cause No.
)	
vs.)	Division No.
)	
WALGREEN CO. d/b/a WALGREENS #05667,)	TRIAL BY JURY DEMANDED
Serve: Prentice-Hall Corporation System, Inc.,)	
Registered Agent)	
222 East Dunklin Street)	
Jefferson City, MO 65101,)	
)	
Defendant.)	

PETITION

Comes now Plaintiff Alice Kopp, and for her cause of action against Defendant Walgreen Co., states as follows:

1. Plaintiff is a resident of the State of Missouri.
2. Defendant Walgreen Co. is an Illinois corporation in good standing doing business as Walgreens #05667 in the State of Missouri.
3. At all relevant times Defendant acted by and through its agents, servants and/or employees.
4. At all relevant times Defendant owned and operated a Walgreens store located at 6071 Telegraph Road, St. Louis County, MO 63129.
5. On September 27, 2020, Plaintiff was a business invitee of Defendant at the Walgreens store located at 6071 Telegraph Road, St. Louis County, MO 63129, when she fell

and was severely injured due to the condition of the flooring which was not reasonably safe for business invitees, to wit:

- A. The mat located in the entrance of the store was loose;
- B. The metal stripping surrounding the mat in the entrance of the store was exposed and raised;
- C. The mat and surrounding metal stripping were in a dangerous condition.

6. Defendant knew, or by using ordinary care, could of known of this dangerous condition, but failed to use ordinary care to remove the unsafe condition, barricading the unsafe condition, or properly warn of the unsafe condition.

7. As a direct result of Defendant's failure to use ordinary care, Plaintiff sustained serious permanent personal injuries, including a fracture to her left arm/shoulder and injuries to her knees. Plaintiff has incurred and continues to incur medical expenses.

WHEREFORE, Plaintiff Alice Kopp prays for judgment against Defendant Walgreen Co. in an amount that is fair and reasonable, but in excess of \$25,000.00, exclusive of interest and costs, for pre-judgment interest, post-judgment interest, costs and for whatever further relief this Court deems just and proper.



Robert J. Radice #30697
HORAS, RADICE & ASSOCIATES, LLC
Attorneys for Plaintiff
2123 Marconi Avenue
St. Louis, MO 63110
(314) 241-4505
(314) 241-7779 Fax
bradice@HRmidwestlaw.com




IN THE 21ST JUDICIAL CIRCUIT COURT, ST. LOUIS COUNTY, MISSOURI

Judge or Division: ELLEN HANNIGAN RIBAUDO	Case Number: 20SL-CC05560
Plaintiff/Petitioner: ALICE M. KOPP	Plaintiff's/Petitioner's Attorney/Address ROBERT JOSEPH RADICE 2123 MARCONI AVENUE SAINT LOUIS, MO 63110
Defendant/Respondent: WALGREEN CO. DBA: WALGREENS #05667	Court Address: ST LOUIS COUNTY COURT BUILDING 105 SOUTH CENTRAL AVENUE CLAYTON, MO 63105
Nature of Suit: CC Pers Injury-Other	(Date File Stamp)

Summons in Civil Case

The State of Missouri to: WALGREEN CO.
Alias:
DBA: WALGREENS #05667

R/A: PRENTICE-HALL CORP. SYS.
222 EAST DUNKLIN STREET
JEFFERSON CITY, MO 65101

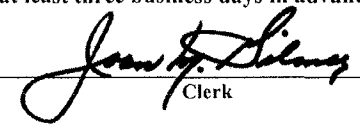
COURT SEAL OF

ST. LOUIS COUNTY

You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for Plaintiff/Petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

SPECIAL NEEDS: If you have special needs addressed by the Americans With Disabilities Act, please notify the Office of the Circuit Clerk at 314-615-8029, FAX 314-615-8739, email at SLCADA@courts.mo.gov, or through Relay Missouri by dialing 711 or 800-735-2966, at least three business days in advance of the court proceeding.

12-NOV-2020
Date

Further Information:
LES


Clerk

Sheriff's or Server's Return

Note to serving officer: Summons should be returned to the court within thirty days after the date of issue.

I certify that I have served the above summons by: (check one)

☐ delivering a copy of the summons and a copy of the petition to the Defendant/Respondent.

☐ leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the Defendant/Respondent with _____ a person of the Defendant's/Respondent's family over the age of 15 years who permanently resides with the Defendant/Respondent.

☐ (for service on a corporation) delivering a copy of the summons and a copy of the petition to _____ (name) _____ (title).

☐ other _____

Served at _____ (address)

in _____ (County/City of St. Louis), MO, on _____ (date) at _____ (time).

Printed Name of Sheriff or Server

Signature of Sheriff or Server

Must be sworn before a notary public if not served by an authorized officer:

(Seal) Subscribed and sworn to before me on _____ (date).

My commission expires: _____ (date) _____ (Notary Public)

Sheriff's Fees, if applicable

Summons \$ _____

Non Est \$ _____

Sheriff's Deputy Salary _____

Supplemental Surcharge \$ 10.00 _____

Mileage \$ _____ (_____ miles @ \$. _____ per mile)

Total \$ _____

A copy of the summons and a copy of the petition must be served on **each** Defendant/Respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.

THE CIRCUIT COURT OF ST. LOUIS COUNTY, MISSOURI

Twenty First Judicial Circuit

NOTICE OF ALTERNATIVE DISPUTE RESOLUTION SERVICES

Purpose of Notice

As a party to a lawsuit in this court, you have the right to have a judge or jury decide your case. However, most lawsuits are settled by the parties before a trial takes place. This is often true even when the parties initially believe that settlement is not possible. A settlement reduces the expense and inconvenience of litigation. It also eliminates any uncertainty about the results of a trial.

Alternative dispute resolution services and procedures are available that may help the parties settle their lawsuit faster and at less cost. Often such services are most effective in reducing costs if used early in the course of a lawsuit. Your attorney can aid you in deciding whether and when such services would be helpful in your case.

Your Rights and Obligations in Court Are Not Affected By This Notice

You may decide to use an alternative dispute resolution procedure if the other parties to your case agree to do so. In some circumstances, a judge of this court may refer your case to an alternative dispute resolution procedure described below. These procedures are not a substitute for the services of a lawyer and consultation with a lawyer is recommended. Because you are a party to a lawsuit, you have obligations and deadlines which must be followed whether you use an alternative dispute resolution procedure or not. **IF YOU HAVE BEEN SERVED WITH A PETITION, YOU MUST FILE A RESPONSE ON TIME TO AVOID THE RISK OF DEFAULT JUDGMENT, WHETHER OR NOT YOU CHOOSE TO PURSUE AN ALTERNATIVE DISPUTE RESOLUTION PROCEDURE.**

Alternative Dispute Resolution Procedures

There are several procedures designed to help parties settle lawsuits. Most of these procedures involve the services of a neutral third party, often referred to as the "neutral," who is trained in dispute resolution and is not partial to any party. The services are provided by individuals and organizations who may charge a fee for this help. Some of the recognized alternative dispute resolutions procedures are:

(1) Advisory Arbitration: A procedure in which a neutral person or persons (typically one person or a panel of three persons) hears both sides and decides the case. The arbitrator's decision is not binding and simply serves to guide the parties in trying to settle their lawsuit. An arbitration is typically less formal than a trial, is usually shorter, and may be conducted in a private setting at a time mutually agreeable to the parties. The parties, by agreement, may select the arbitrator(s) and determine the rules under which the arbitration will be conducted.

(2) Mediation: A process in which a neutral third party facilitates communication between the parties to promote settlement. An effective mediator may offer solutions that have not been considered by the parties or their lawyers. A mediator may not impose his or her own judgment on the issues for that of the parties.

CCADM73

(3) Early Neutral Evaluation (“ENE”): A process designed to bring the parties to the litigation and their counsel together in the early pretrial period to present case summaries before and receive a non-binding assessment from an experienced neutral evaluator. The objective is to promote early and meaningful communication concerning disputes, enabling parties to plan their cases effectively and assess realistically the relative strengths and weaknesses of their positions. While this confidential environment provides an opportunity to negotiate a resolution, immediate settlement is not the primary purpose of this process.

(4) Mini-Trial: A process in which each party and their counsel present their case before a selected representative for each party and a neutral third party, to define the issues and develop a basis for realistic settlement negotiations. The neutral third party may issue an advisory opinion regarding the merits of the case. The advisory opinion is not binding.

(5) Summary Jury Trial: A summary jury trial is a non binding, informal settlement process in which jurors hear abbreviated case presentations. A judge or neutral presides over the hearing, but there are no witnesses and the rules of evidence are relaxed. After the “trial”, the jurors retire to deliberate and then deliver an advisory verdict. The verdict then becomes the starting point for settlement negotiations among the parties.

Selecting an Alternative Dispute Resolution Procedure and a Neutral

If the parties agree to use an alternative dispute resolution procedure, they must decide what type of procedure to use and the identity of the neutral. As a public service, the St. Louis County Circuit Clerk maintains a list of persons who are available to serve as neutrals. The list contains the names of individuals who have met qualifications established by the Missouri Supreme Court and have asked to be on the list. The Circuit Clerk also has Neutral Qualifications Forms on file. These forms have been submitted by the neutrals on the list and provide information on their background and expertise. They also indicate the types of alternative dispute resolution services each neutral provides.

A copy of the list may be obtained by request in person and in writing to: Circuit Clerk, Office of Dispute Resolution Services, 105 South Central Ave., 5th Floor, Clayton, Missouri 63105. The Neutral Qualifications Forms will also be made available for inspection upon request to the Circuit Clerk.

The List and Neutral Qualification Forms are provided only as a convenience to the parties in selecting a neutral. The court cannot advise you on legal matters and can only provide you with the List and Forms. You should ask your lawyer for further information.

CCADM73



IN THE 21ST JUDICIAL CIRCUIT COURT, ST. LOUIS COUNTY, MISSOURI

Judge or Division: ELLEN HANNIGAN RIBAUDO	Case Number: 20SL-CC05560
Plaintiff/Petitioner: ALICE M. KOPP	Plaintiff's/Petitioner's Attorney/Address ROBERT JOSEPH RADICE 2123 MARCONI AVENUE SAINT LOUIS, MO 63110
Defendant/Respondent: WALGREEN CO. DBA: WALGREENS #05667	Court Address: ST LOUIS COUNTY COURT BUILDING 105 SOUTH CENTRAL AVENUE CLAYTON, MO 63105
Nature of Suit: CC Pers Injury-Other	

RECEIVED

NOV 18 2020

COLE COUNTY
SHERIFF'S OFFICE

Summons in Civil Case

FILED

DEC - 7 2020

JOAN M. GILMER
CIRCUIT CLERK, ST. LOUIS COUNTY

The State of Missouri to: WALGREEN CO.

Alias:

DBA: WALGREENS #05667

R/A: PRENTICE-HALL CORP. SYS.
222 EAST DUNKLIN STREET
JEFFERSON CITY, MO 65101

COURT SEAL OF



ST. LOUIS COUNTY

You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for Plaintiff/Petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

SPECIAL NEEDS: If you have special needs addressed by the Americans With Disabilities Act, please notify the Office of the Circuit Clerk at 314-615-8029, FAX 314-615-8739, email at SLCADA@courts.mo.gov, or through Relay Missouri by dialing 711 or 800-735-2966, at least three business days in advance of the court proceeding.

12-NOV-2020

Date

Further Information:
LES

Clerk

Sheriff's or Server's Return

Note to serving officer: Summons should be returned to the court within thirty days after the date of issue.

I certify that I have served the above summons by: (check one)

☐ delivering a copy of the summons and a copy of the petition to the Defendant/Respondent.☐ leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the Defendant/Respondent with a person of the Defendant's/Respondent's family over the age of 15 years who permanently resides with the Defendant/Respondent.☒ (for service on a corporation) delivering a copy of the summons and a copy of the petition to

Sheila Smith (Prentice Hall) (name) Designee (title).

☐ other

Served at 221 Bolivar St Jefferson City, MO 65101 (address)

in Cole (County/City of St. Louis), MO, on 11-20-2020 (date) at 11:00 AM (time).

Printed Name of Sheriff or Server
(Seal)

Signature of Sheriff or Server

Must be sworn before a notary public if not served by an authorized officer:

Subscribed and sworn to before me on (date).

My commission expires:

Date

Notary Public

IN THE CIRCUIT COURT OF ST LOUIS COUNTY
STATE OF MISSOURI

ALICE M. KOPP,

Plaintiff,

vs.

WALGREEN CO.,

Defendant.

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Case No.: 20SL-CC05560

Division No.

ENTRY OF APPEARANCE

Come now Brown & James, P.C. and Justin S. Chapell and enter their appearances as attorneys for Defendant Walgreen Co.

/s/ Justin S. Chapell

Justin S. Chapell (50954)
BROWN & JAMES, P.C.
800 Market Street, Suite 1100
St. Louis, Missouri 63101
Telephone: (314) 242-5231
Fax: (314) 242-5431
Email: jchapell@bjpc.com

Attorneys for Defendant Walgreen Co.

CERTIFICATE OF SERVICE AND
CERTIFICATE OF COMPLIANCE WITH RULE 55.03(a)

I hereby certify that a copy of the foregoing pleading was served by the Court's electronic filing system on this **17th day of December, 2020**, on the counsel of record listed below. In addition, the undersigned counsel certifies under Rule 55.03(a) of the Missouri Rules of Civil Procedure that (he/she) has signed the original of this Certificate and the foregoing pleading.

Mr. Robert J. Radice
Horas, Radice & Associates, LLC
Attorneys for Plaintiff
2123 Marconi Avenue
St. Louis, Missouri 63110

/s/ Justin S. Chapell
Justin S. Chapell (50954)
BROWN & JAMES, P.C.
800 Market Street, Suite 1100
St. Louis, Missouri 63101
Telephone: (314) 242-5231
Fax: (314) 242-5431
Email: jchapell@bjpc.com

Attorneys for Defendant Walgreen Co.

JSC:maf:25263973.1

IN THE CIRCUIT COURT OF ST LOUIS COUNTY
STATE OF MISSOURI

ALICE M. KOPP,

Plaintiff,

vs.

WALGREEN CO.,

Defendant.

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Case No.: 20SL-CC05560

Division No.

**DEFENDANT WALGREEN CO.'S ANSWER TO
PLAINTIFF'S PETITION**

Comes now Defendant, Walgreen Co., and for its Answer to Plaintiff's Petition, states as follows:

1. Defendant is without sufficient knowledge and information to admit or deny the allegations of Paragraph 1, and therefore holds Plaintiff to strict proof thereof.
2. Defendant admits the allegations of Paragraph 2.
3. Defendant makes no answer to Paragraph 3 to the extent it states a legal conclusion not facts to which no answer is required.
4. Defendant admits it operated the subject Walgreens store at all relevant times.
5. Defendant denies the allegations of Paragraph 5, including each subpart.
6. Defendant denies the allegations of Paragraph 6.
7. Defendant denies the allegations of Paragraph 7.

FIRST AFFIRMATIVE DEFENSE

For its First Affirmative Defense, Defendant states that Plaintiff's Petition fails to state a valid cause of action upon which relief may be granted by the Court.

SECOND AFFIRMATIVE DEFENSE

For its Second Affirmative Defense, Defendant states that Plaintiff has failed to mitigate her damages.

THIRD AFFIRMATIVE DEFENSE

For its Third Affirmative Defense, Defendant states that in the event Plaintiff is awarded compensatory damages, the amount of the judgment entered thereon should be reduced in proportion to Plaintiff's comparative negligence, which negligence proximately caused Plaintiff's alleged injuries and damages. Plaintiff was negligent in that:

- (a) She failed to keep a careful lookout; and
- (b) She failed to exercise reasonable care while on Defendant's premises given its alleged condition.

FOURTH AFFIRMATIVE DEFENSE

For its Fourth Affirmative Defense, Defendant states, hypothetically and in the alternative, that Plaintiff's claim is barred by Plaintiff's assumption of the risk, in that she knew of the danger pleaded in the Petition, understood the nature of the risk, and voluntarily proceeded upon Defendant's premises knowing of the danger.

FIFTH AFFIRMATIVE DEFENSE

For its Fifth Affirmative Defense, Defendant states that whatever damages Plaintiff may have sustained, if any, were the direct and proximate result of the carelessness and negligence of individuals and entities over whom this Defendant has no control, and as a result, said Defendant is entitled to a pro rata reduction in any judgment against it, in an amount which corresponds to the relative degree of fault of said other individuals or entities.

SIXTH AFFIRMATIVE DEFENSE

For its Sixth Affirmative Defense, Defendant states, hypothetically and in the alternative, that Plaintiff's claim and cause of action against Defendant is barred in that the alleged dangerous condition was an open and obvious condition which Plaintiff knew or by using ordinary care could have known of said open and obvious condition.

SEVENTH AFFIRMATIVE DEFENSE

For its Seventh Affirmative Defense, Defendant states that Plaintiff's alleged injuries and damages were proximately caused by the independent, intervening acts or omissions of third parties over which this Defendant had no control.

EIGHTH AFFIRMATIVE DEFENSE

For its Eighth Affirmative Defense, Defendant reiterates that it was not negligent, but states hypothetically and in the alternative, that if it is found by the trier(s) of fact to be less than fifty-one percent (51%) at fault, the amount of the judgment entered against this Defendant should equate to the percentage of fault assessed against this Defendant by the trier(s) of fact. R.S.Mo. 537.067.

NINTH AFFIRMATIVE DEFENSE

For its Ninth Affirmative Defense, Defendant states that to the extent Plaintiff is compensated for the alleged damages by receiving payment from other persons or entities, the amount of any such compensation should be set off against any recovery Plaintiff may receive in this action against Defendant.

WHEREFORE, having fully answered Plaintiff's Petition, Defendant Walgreen Co. prays to be dismissed hence with its costs.

/s/ Justin S. Chapell

Justin S. Chapell (50954)
BROWN & JAMES, P.C.
800 Market Street, Suite 1100
St. Louis, Missouri 63101
Telephone: (314) 242-5231
Fax: (314) 242-5431
Email: jchapell@bjpc.com

Attorneys for Defendant Walgreen Co.

CERTIFICATE OF SERVICE AND
CERTIFICATE OF COMPLIANCE WITH RULE 55.03(a)

I hereby certify that a copy of the foregoing pleading was served by the Court's electronic filing system on this **17th day of December, 2020**, on the counsel of record listed below. In addition, the undersigned counsel certifies under Rule 55.03(a) of the Missouri Rules of Civil Procedure that (he/she) has signed the original of this Certificate and the foregoing pleading.

Mr. Robert J. Radice
Horas, Radice & Associates, LLC
Attorneys for Plaintiff
2123 Marconi Avenue
St. Louis, Missouri 63110

/s/ Justin S. Chapell

Justin S. Chapell (50954)
BROWN & JAMES, P.C.
800 Market Street, Suite 1100
St. Louis, Missouri 63101
Telephone: (314) 242-5231
Fax: (314) 242-5431
Email: jchapell@bjpc.com

Attorneys for Defendant Walgreen Co.

JSC:maj:25263885.1

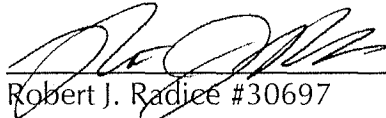
IN THE CIRCUIT COURT OF THE COUNTY OF ST. LOUIS
STATE OF MISSOURI

ALICE M. KOPP,)
)
Plaintiff,) Cause No. 20SL-CC05560
)
vs.) Division No. 18
)
WALGREEN CO. d/b/a WALGREENS #05667,)
)
Defendant.)

CERTIFICATE OF SERVICE

Copies of the foregoing Plaintiff's First Set of Interrogatories Directed to Defendant and Plaintiff's First Request for Production Directed to Defendant were emailed to all attorneys of record this 28th day of December, 2020.

In addition, pursuant to the Missouri Rules of Civil Procedure, electronic copies of same in Word Perfect format were also emailed this date to counsel for Defendant.



Robert J. Radice #30697
HORAS, RADICE & ASSOCIATES, LLC
Attorneys for Plaintiff
2123 Marconi Avenue
St. Louis, MO 63110
(314) 241-4505
(314) 241-7779 Fax
bradice@HRmidwestlaw.com

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served this 28th day of December 2020 via the Court's ECF filing system and email upon: Justin S. Chapell, Esq., Brown & James, P.C., Attorneys for Defendant, 800 Market St., Ste. 1100, St. Louis, MO 63101, jchapell@bjpc.com.



IN THE CIRCUIT COURT OF ST LOUIS COUNTY
STATE OF MISSOURI

ALICE M. KOPP,

Plaintiff,

vs.

WALGREEN CO.,

Defendant.

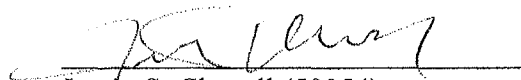
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Case No.: 20SL-CC05560

Division No.

CERTIFICATE OF SERVICE

A copy of Defendant Walgreen Co.'s First Set of Interrogatories and First Request for Production were mailed and emailed in Word format to: Mr. Robert J. Radice, Horas, Radice & Associates, LLC, Attorneys for Plaintiff, 2123 Marconi Avenue, St. Louis, Missouri 63110 at bradice@HRmidwestlaw.com on this 30th day of DEC, 2020.



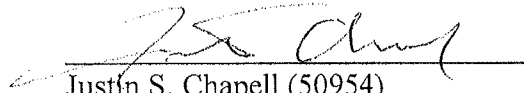
Justin S. Chapell (50954)
BROWN & JAMES, P.C.
800 Market Street, Suite 1100
St. Louis, Missouri 63101
Telephone: (314) 242-5231
Fax: (314) 242-5431
Email: jchapell@bjpc.com

Attorneys for Defendant Walgreen Co.

CERTIFICATE OF SERVICE AND
CERTIFICATE OF COMPLIANCE WITH RULE 55.03(a)

I hereby certify that a copy of the foregoing pleading was served by the Court's electronic filing system on this 30th day of Dec, 2020, on the counsel of record listed below. In addition, the undersigned counsel certifies under Rule 55.03(a) of the Missouri Rules of Civil Procedure that (he/she) has signed the original of this Certificate and the foregoing pleading.

Mr. Robert J. Radice
Horas, Radice & Associates, LLC
Attorneys for Plaintiff
2123 Marconi Avenue
St. Louis, Missouri 63110


Justin S. Chapell (50954)
BROWN & JAMES, P.C.
800 Market Street, Suite 1100
St. Louis, Missouri 63101
Telephone: (314) 242-5231
Fax: (314) 242-5431
Email: jchapell@bjpc.com

Attorneys for Defendant Walgreen Co.

JSC:maf:25289267.1

IN THE CIRCUIT COURT OF THE COUNTY OF ST. LOUIS
STATE OF MISSOURI

ALICE M. KOPP,)
)
Plaintiff,) Cause No. 20SL-CC05560
)
vs.) Division No. 18
)
WALGREEN CO. d/b/a WALGREENS #05667,)
)
Defendant.)

CERTIFICATE OF SERVICE

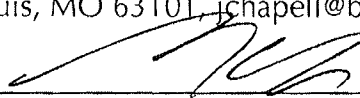
Copies of the foregoing Plaintiff's Answers to Defendant's First Set of Interrogatories and Plaintiff's Response to Defendant's First Requests for Production were served via first class, prepaid U.S. Mail upon all attorneys of record this 14th day of January, 2021.



Robert J. Radice #30697
HORAS, RADICE & ASSOCIATES, LLC
Attorneys for Plaintiff
2123 Marconi Avenue
St. Louis, MO 63110
(314) 241-4505
(314) 241-7779 Fax
bradice@HRmidwestlaw.com

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served this 14th day of January 2021 via the Court's ECF filing system upon: Justin S. Chapell, Esq., Brown & James, P.C., Attorneys for Defendant, 800 Market St., Ste. 1100, St. Louis, MO 63101, jchapell@bjpc.com.



IN THE CIRCUIT COURT OF ST LOUIS COUNTY
STATE OF MISSOURI

ALICE M. KOPP,)	
)	
Plaintiff,)	
)	Case No.: 20SL-CC05560
vs.)	
)	Division No.
WALGREEN CO.,)	
)	
Defendant.)	

CERTIFICATE OF MAILING

A copy of Defendant Walgreen Co.'s Separate Objections to Plaintiff's First Set of Interrogatories was mailed and sent via email to: Mr. Robert J. Radice, Horas, Radice & Associates, LLC, Attorneys for Plaintiff, 2123 Marconi Avenue, St. Louis, Missouri 63110 at bradice@HRmidwestlaw.com on this **27th day of January, 2021**.

/s/ Justin S. Chapell
Justin S. Chapell (50954)
BROWN & JAMES, P.C.
800 Market Street, Suite 1100
St. Louis, Missouri 63101
Telephone: (314) 242-5231
Fax: (314) 242-5431
Email: jchapell@bjpc.com

Attorneys for Defendant Walgreen Co.

CERTIFICATE OF SERVICE AND
CERTIFICATE OF COMPLIANCE WITH RULE 55.03(a)

I hereby certify that a copy of the foregoing pleading was served by the Court's electronic filing system on this **27th day of January, 2021**, on the counsel of record listed below. In addition, the undersigned counsel certifies under Rule 55.03(a) of the Missouri Rules of Civil Procedure that (he/she) has signed the original of this Certificate and the foregoing pleading.

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